

**DOCKET****06-AFP-1**DATE May 19 2006RECD. May 22 2006

May 19, 2006

California Energy Commission
Docket Unit
Attn: Docket No. 06-AFP-1
1516 Ninth Street
Sacramento, CA 95814-5512

RE: 06-AFP-1 Scoping Notice – Alternative Fuels Plan

Dear Commissioners,

Bluewater Network appreciates the opportunity to comment on the Committee Scoping Notice for the *State Plan to Increase the Use of Alternative Transportation Fuels* (Alternative Fuels Plan). Bluewater supports the general scope and milestones as set forth in the scoping notice, but would like to comment on a few issues.

First, the scoping notice indicates that the Energy Commission does not intend to pick “winners” and “losers” in this process. Bluewater recognizes that we are moving into a poly-fuel world where, in all likelihood, multiple alternative fuels will be in use. Bluewater also agrees that the State should not mandate one alternative fuel over another. At the same time, when recommending policies in a world of limited resources, the Alternative Fuels Plan should prioritize among fuels so that the state’s resources will be used most effectively to increase alternative fuel development and use and optimize environmental and public health benefits.

Second, the notice indicates that the definition of alternative fuels will be expanded to include liquid fuels derived from natural gas, biomass, coal, and petroleum coke. Bluewater suggests that a mechanism be created to drop certain of these fuels from further analysis if the initial fuel-cycle assessment indicates that the environmental and public health benefits of any such fuel is below a certain standard. This would obviate the need to perform market assessments and make policy recommendations as to fuels that have little environmental or public health benefits, especially given that the CEC is undertaking a very large amount of work in a short period of time.

Finally, Bluewater would like to emphasize the importance of having full transparency in this process, especially with regard to the assessments that will be performed. Full transparency will help ensure a meaningful and productive process.

Thank you for your consideration of these comments and for the opportunity to participate.

Sincerely,

/s/

Danielle R. Fugere
Global Warming Program Director
BLUEWATER NETWORK